

June 8, 2010

via electronic filing

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

RE: SEIU COPE, FEC ID C00004036
February Monthly Report (1/1/10 ? 1/31/10)

Dear Ms. Lewis:

I am counsel for the Service Employees International Union Committee on Political Education (SEIU COPE). This is in response to your letter dated May 5, 2010. I will address each of the items in your letter in turn:

1) You request clarification about the disbursement to SEIU Health and Welfare Fund in the amount of \$136,596.70. As noted in your letter, our report described these as ""revised cost door-to-door canvass staff expenses"" and included a memo identifying them as ""late billed expenses for pension costs related to staff time used and paid for in 2008 and in addition to estimated expenditures reported on 48 hour notices at the time."" This amount was based on a review by the Health and Welfare Fund of total salary costs paid by one of our affiliates who employed members that participated in our door-to-door canvass operation during the 2008 campaign. These expenses relate to canvasses previously reported as independent expenditures and funded principally through advances from SEIU COPE to the SEIU general fund as reported on prior 48 hour reports.

2). While reserving any legal arguments on what detail is required, we have amended our report to explicitly show as separate memo entries the vendors previously listed in the descriptive text for the schedule E entries for payment to the credit card vendor.

If you have any further questions regarding this mater, please feel free to contact me at 202-350-6571.

Very truly yours,

Mark Schneider
Associate General Counsel
Counsel for Government Affairs

cc: Anna Burger, Treasurer, SEIU COPE
